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15 Attorneys for Defendants  
16 UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,  
21 Plaintiff,  
22 v.  
23 UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
24 Defendants.

25 Case No. 3:17-cv-00939-WHA

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27  
28 **DECLARATION OF MICHELLE  
YANG IN SUPPORT OF PLAINTIFF  
WAYMO LLC'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEALITS  
SUBMISSION IN RESPONSE TO THE  
COURT'S ORDER REQUIRING  
FURTHER RESPONSE RE UNJUST  
ENRICHMENT (DKT. 2406)**

1 I, Michelle Yang, declare as follows:

2       1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this  
 3 declaration based upon matters within my own personal knowledge and if called as a witness,  
 4 I could and would competently testify to the matters set forth herein. I make this declaration in  
 5 support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Its Submission in  
 6 Response to the Court's Order Requiring Further Response re: Unjust Enrichment Damages  
 7 ("Submission") (Dkt. 2406).

8       2. I have reviewed the following documents and confirmed that only the portions  
 9 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 1	Red boxes
Exhibit 2	Red box

10       3. The red boxes of Exhibit 1 contain highly confidential information regarding  
 11 Uber's business strategy, internal market evaluations, potential cost models, future production  
 12 estimates, and estimated development timelines. It also contains highly confidential information  
 13 regarding third-party vendors with business agreements subject to NDAs, including pricing  
 14 information. This information is not publicly known, and its confidentiality is strictly maintained.  
 15 I understand that disclosure of this information would give competitors knowledge into elements  
 16 of Uber's business strategy, financial estimates regarding various elements of Uber's business,  
 17 and confidential vendors. Uber's competitive standing could be significantly harmed.

18       4. The red box of Exhibit 2 contains highly confidential information regarding a  
 19 potential cost model for a LiDAR. This information is not publicly known, and its confidentiality  
 20 is strictly maintained. I understand that disclosure of this information would give competitors  
 21 knowledge into elements of the potential cost model for LiDAR that was considered by Uber for  
 22 one of its LiDAR designs, and Uber's competitive standing could be significantly harmed.

23       5. Defendants' request to seal is narrowly tailored to the portions of exhibits to  
 24 Waymo's Submission that merit sealing.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st  
2 day of December, 2017 at Washington, District of Columbia.

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4 */s/ Michelle Yang*  
5 Michelle Yang  
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